

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ERIK SHEEHAN,

04 12364 JLT

Plaintiff,

v.

Civil Action No.

VERIZON COMMUNICATIONS, INC., LAURA)
CARDINALE, LISA DAMASK, CAROLYN DRISCOLL,)
PAUL McGOVERN, LINDA RICHELSON, DOREEN)
TOBEN and DOUG WILDER,

Defendants.

AFFIDAVIT OF PAUL MCGOVERN

I, Paul McGovern, do hereby depose and state the following:

1. I am of legal age, have personal knowledge of the matters set forth herein and would be competent to testify about the information contained in this Affidavit.
2. I am an attorney licensed to practice law in the Commonwealth of Massachusetts and I am the EEO Management Consultant for Verizon Communications, Inc. ("Verizon"). In this capacity I served as Verizon's representative at the Massachusetts Commission Against Discrimination ("MCAD") through the probable cause finding in connection with this matter.
3. As part of my duties as the EEO Management Consultant, I receive and respond to claims of discrimination at Verizon. My responsibilities include investigating internal allegations of discrimination and responding to charges filed at the MCAD.
4. I received and responded to the Charge of Discrimination ("Charge") filed by Erik Sheehan ("Sheehan") with the MCAD against Verizon on November 6, 2002.
5. The Charge, which is attached hereto as Exhibit 1, names Verizon as the only Respondent, and does not name Laura Cardinale, Lisa Damask, Carolyn Driscoll, Paul McGovern, Linda Richelson, Doreen Toben or Doug Wilder (collectively "Individual Defendants") as Respondents in the Charge.

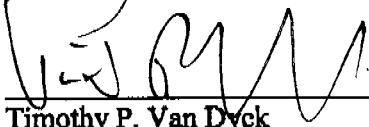
6. To my knowledge, no other Charges of Discrimination were filed against the Individual Defendants or served upon them within the 300 days permitted by Mass. Gen. Laws ch. 151B, § 5.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 9 OF NOVEMBER,
2004.


Paul McGovern
EEO Management Consultant,
Verizon Communications, Inc.

CERTIFICATE OF SERVICE

I, Timothy P. Van Dyck, hereby certify that on this 8th day of November, 2004, I caused a copy of the foregoing document to be mailed via first-class mail, to Domenic Finelli, Esq., Barrister Hall, 199 Revere Street, Revere, MA 02151.


Timothy P. Van Dyck